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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MARK YOUNG, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

SOLANA LABS, INC., THE SOLANA
FOUNDATION, ANATOLY
YAKOVENKO, MULTICOIN CAPITAL
MANAGEMENT LLC, KYLE SAMANI, and
FALCONX LLC,
Defendants.

Case No.: 3:22-cv-03912-JD

**STIPULATION AND [PROPOSED]
ORDER CONTINUING CASE
MANAGEMENT CONFERENCE AND ALL
ASSOCIATED DEADLINES**

(Civil L.R. 6-1, 6-2, 7-12)

Hon: James Donato

1 Plaintiff Mark Young (“Plaintiff”) and Defendant Solana Labs, Inc. (“Solana Labs”)
 2 (collectively, the “Parties”), through their respective attorneys of record, herein enter into this
 3 Stipulation pursuant to Local Rule 6-1(a) and submit a stipulated request under Local Rule 6-2
 4 that the Court modify dates in its schedule related to ADR matters, the initial case management
 5 conference, and related deadlines. This stipulation is based on the following circumstances:

6 WHEREAS, on July 1, 2022, Plaintiff filed a complaint captioned *Mark Young, on behalf*
 7 *of himself and all others similarly situated, v. Solana Labs, Inc., The Solana Foundation, Anatoly*
 8 *Yakovenko, Multicoi Capital Management LLC, Kyle Samani, and FalconX LLC* in the above-
 9 captioned case alleging violations of the Securities Act of 1933 and the California Corporations
 10 Code (the “Complaint”) against Defendants Solana Labs, The Solana Foundation, Anatoly
 11 Yakovenko, Multicoi Capital Management LLC, Kyle Samani, and FalconX LLC (collectively,
 12 the “Defendants”);

13 WHEREAS, on July 6, 2022, this Court issued an Initial Case Management Scheduling
 14 Order with ADR Deadlines, setting the Initial Case Management Conference for September 29,
 15 2022 (Dkt. 9);

16 WHEREAS, this action asserts claims under the Securities Act of 1933, which is
 17 governed by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”). *See* 15 U.S.C.
 18 § 77z-1 et seq. Under 15 U.S.C. §77z-1(b)(1), absent a court order, all discovery and other
 19 proceedings are stayed during the pendency of any motion to dismiss. The PSLRA also provides
 20 for consolidation of all related actions and the appointment of lead plaintiff and lead counsel.
 21 *See* 15 U.S.C. §77z-1(a);

22 WHEREAS, in accordance with the PSLRA, counsel for Plaintiff published notice of the
 23 pendency of the action on the docket on July 21, 2022 (Dkt. 20);

24 WHEREAS, on August 1, 2022, Plaintiff and Solana Labs filed a Stipulation to Extend
 25 Time to Respond to the Complaint until after the selection of Lead Plaintiff (Dkt. 26);

26 WHEREAS, the last day to file motions to serve as lead plaintiff was September 6, 2022
 27 (Dkt. 20-1); there were two (2) motions filed by that date;

1 **WHEREAS**, briefing on the motions to serve as lead plaintiff will not be complete until
 2 September 27, 2022, at the earliest, which is just two days before the date on which the Initial
 3 Case Management Conference is scheduled;

4 **WHEREAS**, the Parties anticipate that the eventual lead plaintiff will file an amended
 5 complaint and Defendants will file one or more motions to dismiss the claims asserted against
 6 them;

7 **WHEREAS**, Defendants are complying with their obligation to preserve relevant
 8 documents and information while discovery is stayed;

9 **WHEREAS**, in the interest of efficiency, the Parties have conferred and respectfully
 10 request that the Initial Case Management Conference, currently calendared for September 29,
 11 2022, along with any associated deadlines under the Federal Rules of Civil Procedure and the
 12 Local Rules for the United States District Court for the Northern District of California and all
 13 ADR Multi-Option Program deadlines, be vacated and reset following the appointment of lead
 14 plaintiff and lead counsel, with all associated deadlines continued correspondingly.

15 IT IS ACCORDINGLY STIPULATED, by and between the undersigned counsel for the
 16 parties, that:

17 1. Subject to the Court's approval of this stipulation, the Initial Case Management
 18 Conference scheduled for September 29, 2022 is vacated, along with any associated deadlines
 19 under the Federal Rules of Civil Procedures and the Local Civil Rules for the United States
 20 District Court for the Northern District of California, and all ADR Multi-Option Program
 21 deadlines, shall be vacated and reset after appointment of lead plaintiff and lead counsel, with all
 22 associated deadlines continued correspondingly.

24 DATED: September 7, 2022

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Attorneys for Defendant Solana Labs, Inc.

DATED: September 7, 2022

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1 DATED: September 7, 2022

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16 *and Kyle Samani*
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1 PURSUANT TO STIPULATION, IT IS SO ORDERED

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3 DATED:

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Hon. James Donato
United States District Court Judge

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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing Stipulation and [Proposed] Continuing Case Management Conference and all Associated Deadlines. Pursuant to L.R 5-1(h)(3) regarding signatures, I, Matthew Rawlinson, attest that concurrence in the filing of this document has been obtained.

DATED: September 7, 2022

/s/ Matthew Rawlinson

Matthew Rawlinson